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February 28, 2013

Ms. Marlene H. Dortch, Commission Secretary Federal Communications Commission 445 12th Street, SW, Suite TW-A325 Washington, DC 20554

Filed Electronically Via ECFS

RE: SkyNet360, LLC

Customer Proprietary Network Information Certification

EB Docket No. 06-36

Dear Ms. Dortch:

SkyNet360, LLC, by its undersigned attorneys, hereby submits its 2012 CPNI Compliance Certificate and Accompanying Statement certifying compliance with Section 64.2001 et seq. of the Commission's rules.

Please contact the undersigned should you have any questions or concerns at (269) 381-8893 extension 226 or patrick@crockerlawfirm.com.

Very truly yours,

CROCKER & CROCKER

atrick D. Crocker

Enclosures

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2012

Date filed: February <u>75</u>, 2013

Name of Company Covered by this Certification: SkyNet360, LLC

Form 499 Filer ID: <u>IN PROCESS</u>

Name of Signatory: Jose Camarillo

Title of Signatory: CEO

I am the CEO of SkyNet360, LLC and as such do hereby certify, affirm, depose, and say that I have authority to make this Customer Proprietary Network Information ("CPNI") Annual Certification of Compliance on behalf of SkyNet360, LLC. I have personal knowledge that SkyNet360, LLC has established adequate operating procedures to ensure compliance with the Commission's CPNI rules as set forth in 47 C.F.R. § 64.2001 et. seq.

Attached to this Certification is an Accompanying Statement explaining how the company's procedures ensure compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

SkyNet360, LLC received no customer complaints in the past year concerning the unauthorized release of CPNI. Further, SkyNet360, LLC has taken no action against data brokers for the unauthorized release of CPNI during calendar year 2012. SkyNet360, LLC will report any information it may obtain with respect to the processes pretexters are using to attempt to access CPNI and what steps SkyNet360, LLC is taking to protect CPNI.

This certification is dated this 25 day of February, 2013.

Jose Camarillo CEO

SkyNet360, LLC

Customer Proprietary Network Information Certification Attachment A

SkyNet360, LLC has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, ("section 222") and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in sections 64.2001 – 64.2011 of the Commission's rules. This attachment summarizes those practices and procedures, which have been updated so that they are adequate to ensure compliance with the Commission's CPNI rules.

SkyNet360, LLC provides private services over dedicated lines to large enterprise and carrier customers pursuant to ICB contracts. SkyNet360, LLC's customer contracts uniformly contain confidentiality agreements that address customers' private information. It is SkyNet360, LLC's policy not to disclose CPNI except as specifically set out in its contracts with its customers and where required by law.

Safeguarding against pretexting

• SkyNet360, LLC takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. SkyNet360, LLC is committed to notify the FCC of any novel or new methods of pretexting it discovers and of any actions it takes against pretexters and data brokers.

Training and discipline

• SkyNet360, LLC has an express disciplinary process in place for violation of the SkyNet360, LLC's CPNI practices and procedures. SkyNet360, LLC employees are required to review and abide by SkyNet360, LLC's Code of Conduct, which, prohibits all employees from using customer information other than for providing service to the customer or as required to be disclosed by law.

SkyNet360, LLC's use of CPNI

- SkyNet360, LLC uses CPNI for the following purposes:
 - (1) To initiate, render, maintain, repair, bill and collect for services
 - (2) To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
 - (3) For network maintenance; and
 - (4) As required by law.



- SkyNet360, LLC does not distribute CPNI to third parties for their sales or marketing purposes. Nor does SkyNet360, LLC share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors, or any other third party for the purpose of marketing any service.
- SkyNet360, LLC does not share, sell, lease or otherwise provide CPNI to any third party except pursuant to appropriate non-disclosure agreements. SkyNet360, LLC will not otherwise disclose CPNI to a third party except when required by a lawfully issued government subpoena.

Additional safeguards

- SkyNet360, LLC does not use CPNI for marketing purposes and therefore does not have records to maintain regarding marketing campaigns that use its customers' CPNI.
- SkyNet360, LLC has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.
- SkyNet360, LLC designates one or more officers, as an agent or agents of the SkyNet360, LLC, to sign and file a CPNI compliance certificate on an annual basis. The certificate conforms to the requirements set forth in FCC rule 64.2009(e).
- SkyNet360, LLC does not disclose CPNI over the phone and does not allow for online access to CPNI.
- In the event of a breach of CPNI, SkyNet360, LLC will comply with all applicable breach notification laws.

